



## Environmental Justice Technical Memorandum

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To: John Ho, Assistant Local Programs Engineer, Washington State Department of Transportation

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Carl Einfeld, PE, Project Manager, Perteet Inc.

CC: Robert Victor, PE, Public Works Project Manager, City of Lynnwood

Date: April 4, 2014 (Revised September 18, 2014)

Re: Poplar Way Extension Bridge – Environmental Justice Technical Memorandum

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### Introduction

The City of Lynnwood proposes to construct a new bridge crossing over the I-5 corridor and within the City of Lynnwood, Snohomish County, Washington. The City of Lynnwood has received federal funds for the project, and will therefore follow the environmental review process and guidelines established by the National Environmental Policy Act (NEPA). The NEPA process consists of an evaluation of the environmental effects of a particular project and its alternatives. Further consultation with the Federal Highway Administration (FHWA) and the Washington State Department of Transportation (WSDOT) will confirm the level of environmental review, which is expected to be authorized as a Documented Categorical Exclusion (DCE). As the Environmental Justice (EJ) evaluation in this analysis indicates, EJ populations are present in the project's study area, temporary impacts will be experienced, but minimization and outreach will help to offset the impacts.

Title VI (Sec. 601) of the Civil Rights Act of 1964 is a federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. It is illegal for any Washington State Department of Transportation (WSDOT) division, the City of Lynnwood, Washington, or any other contractor/sub-recipient affiliated with WSDOT to withhold or refuse benefits, services, or funding based on race, color, or national origin. Therefore the potential for Title VI impacts were also reviewed under this screening memo. The City of Lynnwood will comply with Title VI.

### Project Description

The City of Lynnwood proposes to improve access to and circulation within their City Center. The Poplar Way Extension Bridge is a key transportation improvement identified within the "Interstate 5 (I-5) to Lynnwood City Center Access Study," developed by the City in cooperation with the Washington State Department of Transportation (WSDOT), the Federal Highway Administration (FHWA), and Snohomish County. The City proposes to construct a new bridge across I-5 between Poplar Way and 33rd Avenue W (at approximately 196th Street SW). The proposed project is located in Lynnwood, Snohomish County, Washington. The project is in Township 27N, Range 04E, Sections 15 and 22. On I-5, the project crossing is at Milepost 180. See vicinity map, Figure 1.

Major elements of the Poplar Way Extension Bridge project will include a new multi-lane bridge structure, approximately 600 feet long with six vehicle lanes, and sidewalks and bike lanes on



## Environmental Justice Technical Memorandum

both sides. Intersection modifications will be made at Alderwood Mall Parkway/Poplar Way, 196th Street SW/Poplar Way, and Alderwood Mall Boulevard/33rd Avenue W. As part of the bridge span, new legs will be added to the 196th Street SW/Poplar Way and Alderwood Mall Boulevard/33rd Avenue W intersections. To accommodate the bridge, the project includes grade adjustments at these intersections: up to three feet at the 196th Street SW/Poplar Way intersection and up to 5.5 feet at the Alderwood Mall Boulevard/33rd Avenue W intersection. Widening and restriping of portions of Poplar Way, 196th Street SW, Alderwood Mall Boulevard, 33rd Avenue W, and Alderwood Mall Parkway are also included. Retaining walls will also be needed at these intersections to accommodate the grade changes, as well as at the bridge abutments. Stormwater will be collected and then treated at an existing stormwater facility, which will be upgraded (but not expanded).

The project will also accommodate the Interurban Trail, which runs along Alderwood Mall Boulevard on the west/northwest side of I-5. This trail is a regional, multi-use paved facility that connects communities from Shoreline to Everett. To accommodate the trail, a separate three-sided concrete box structure will cross over the trail, and the trail profile will be lowered. Although funding for right of way acquisition and construction have not yet been secured, for purposes of this report, construction of the project is assumed to begin in 2015, with a planned opening in 2017.

### Environmental Justice Summary

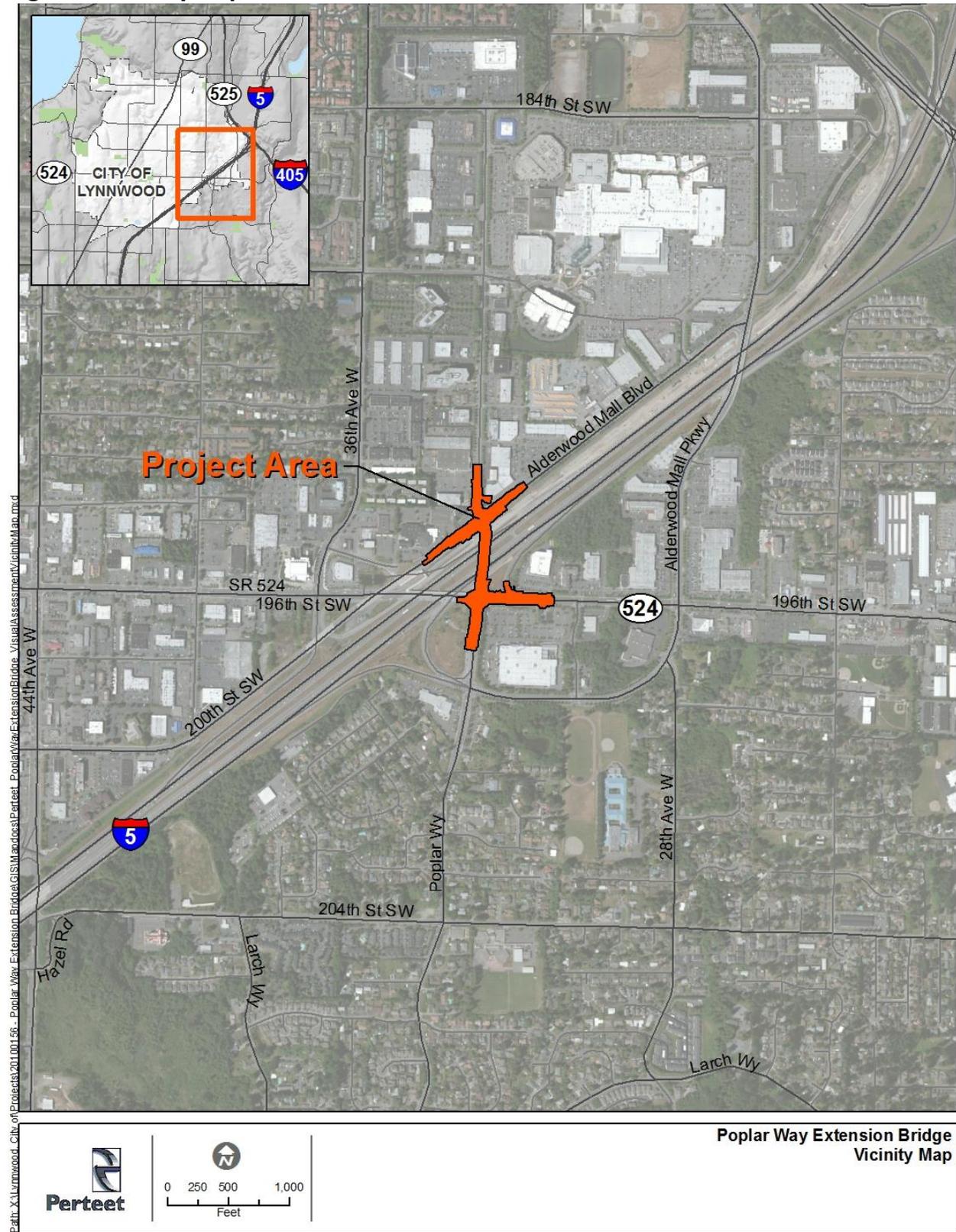
The purpose of this analysis is to identify minority, limited English proficiency (LEP), and low-income populations, also known as “environmental justice (EJ) populations” within the project vicinity. This analysis considers 2007-2011 U.S. Census data and local school data to identify affected populations. This memorandum will discuss any disproportionately high and adverse effects that would be predominately borne by these populations.

This memorandum reveals the presence of EJ populations within the project area as well as temporary effects to all populations within the project area. The analysis concludes that negative effects are minor in nature and are outweighed by the positive benefits associated with the project. Minority, low-income, and LEP populations will not be disproportionately affected by this project.

This memorandum indicates that everyone in the project area, including EJ populations, will receive the transportation and safety benefits of the reconstructed roadway and new bridge crossing. Project benefits include:

- Improved safety
- Enhanced connectivity to City Center
- Improved mobility
- Improved non-motorized circulation and access to the Interurban Trail
- Aesthetic enhancement of the streetscape
- Alternate routes for emergency vehicles.

Figure I - Vicinity Map



Path: X:\Lynnwood\_City\_of\Projects\2011001156 - Poplar Way Extension Bridge\GIS\MapDocs\Perteeet\_VisualAssessment\VicinityMap.mxd

Source: City of Lynnwood; Snohomish County; ESRI Imagery



## Environmental Justice Technical Memorandum

### The Role of Environmental Justice

In 1994, the President of the United States signed Executive Order 12898, which requires federal agencies to identify and avoid “disproportionately high and adverse” effects on minority or low-income populations for federal programs that affect human health or the environment. The EJ evaluation for this project follows guidance and methods developed by the Federal Highway Administration (FHWA) and WSDOT. Such guidance defines a “disproportionately high and adverse” effect on minority and low-income populations as an effect that:

- Is predominantly borne by a minority and/or low-income population; or
- Will be suffered by the minority and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population (FHWA Order 6640.23A, 2012).

EJ considerations must also be incorporated throughout the transportation planning and decision-making processes to comply with NEPA. The principles of environmental justice are reflected in Title VI of the 1964 Civil Rights Act, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended (42 U.S.C. 4601 et seq.), the Transportation Equity Act of the 21st Century (TEA-21) and other U.S. Department of Transportation (DOT) statutes, relocation regulations, and guidance that affect social, economic, and environmental elements; public health; and public involvement.

### Definition of Environmental Justice Populations

Minority populations are defined as any readily identifiable group of minority persons who live in a geographical area. A minority is a person who is:

- Black or African American (a person having origins in any of the black racial groups of Africa);
- Asian/Pacific Islander (a person having origins in the Far East, Southeast Asia, or the Indian subcontinent);
- Pacific Islander (a person having origins in any of the Pacific Islands);
- American Indian or Alaskan Native (any of the original peoples of North America, and who maintains cultural identification through tribal affiliation or community recognition);
- Hispanic (a person with roots from Mexican, Puerto Rican, Cuban, Central or South American, or the Spanish culture or origin, regardless of race).

“Low income” is defined as household income that is at or below the federally designated poverty level for a given household size. Low-income populations are any readily identifiable group of low income persons who live in a geographic area (WSDOT, 2012).

The FHWA uses criteria similar to the Department of Justice guidelines to evaluate projects that may affect “Limited English Proficient” (LEP) persons. These guidelines require public outreach efforts, including translation, for “each eligible LEP language group that constitutes five percent or 1,000 people (whichever is less) that will likely be affected by a project” (U.S. Department of Justice 2009).



## Environmental Justice Technical Memorandum

### Study Area

The study area for this EJ analysis is defined as the limits of the extent of potential effects from the project on EJ populations (which is within approximately one-half mile of the construction footprint for this project). For purposes of data analysis, census tract block group boundaries are also followed in defining the study area. All census block groups that overlapped with the study area were included in the analysis.

The study area and census block groups are shown in Figure 2 - Study Area. Choosing this area incorporates most of the social and environmental effects incurred by the project, such as temporary noise, air, traffic and access effects (see “Potential Temporary Effects” and “Potential Permanent Effects” Sections).

### Land Uses in Project and Study Area

The project site is located in Lynnwood, Washington, between Poplar Way and 33<sup>rd</sup> Avenue W. Alderwood Mall Boulevard runs northeast-southwest and connects to 33<sup>rd</sup> Avenue W on the north. SR 524/196<sup>th</sup> Street SW runs east-west and connects to Poplar Way to the south. Further to the south, Poplar Way connects to Alderwood Mall Parkway.

The project site is comprised of the proposed bridge location across the I-5 corridor between Poplar Way and 33<sup>rd</sup> Avenue W. Much of the project area including the I-5 corridor and south side of I-5 is within the WSDOT right-of-way; on the north side of the I-5 corridor, the project is largely within City of Lynnwood right-of-way. The properties immediately southeast of the project site are zoned Planned Commercial Development and contain a Lowe’s Home Improvement and Bed Bath and Beyond. The area immediately northwest of the project site is zoned City Center North with office buildings and a furniture store. The area immediately to the northeast is zoned Planned Commercial Development and is developed with strip retail.

Two local jurisdictions, the City of Lynnwood and Snohomish County, govern the study area. The properties in the north, west, and east part of the study area are within the City of Lynnwood, while the properties in the south part of the study area are within unincorporated Snohomish County. Outside of the immediate project area, the properties along 196<sup>th</sup> Street SW toward the west are zoned City Center Core Mixed Use, with a convention center, restaurants, and shops. Single Family and multi-family properties are located to the northwest. The properties to the north are zoned Business/Technical Park and Planned Regional Shopping Center. Alderwood Mall is located to the northeast part of the study area. To the east, the properties are zoned Planned Commercial Development with big chain stores including Best Buy, Barnes & Noble, Nordstrom Rack, and Whole Foods Market. The southern portion of the study area includes Alderwood Middle School, Lynnwood Range Rover/ Jaguar Dealership, is within unincorporated Snohomish County, and is zoned Multi-Family Residential and Single Family Residential.

Recreational uses in the area include the Interurban Trail, which runs between Alderwood Mall Blvd and I-5. Heritage Park is located to the south of the project site at the southeast corner of Poplar Way and Alderwood Mall Parkway.





# Environmental Justice Technical Memorandum

## Methodology

This report describes the existing minority, low-income, and language characteristics of populations in the study area. Methods to assess the potential for disproportionately high and adverse effects on EJ populations include:

- Conducting demographic analysis of the study area to determine presence of EJ populations using Census data;
- Analyzing a second source of demographic data to confirm the presence of EJ populations and data regarding languages spoken in the area;
- Identifying potential temporary and permanent effects on the EJ populations;
- Addressing impacts with appropriate mitigation and/or minimization, and specific needs for EJ populations;
- Developing a public outreach plan; and
- Documenting the process.

## Demographics

### Minority Populations (U.S. Census Data)

Data from the U.S. Census (2007-2011 American Community Survey [ACS] data) were reviewed to assess the presence of minority and low-income populations in the study area. The census data shows that the study area is home to 24,790 residents. Races in the study area include white, African American, American Indian/Native Alaska, Asian, Pacific Islander, Other, and those reporting themselves as two or more races. Table I shows the breakdown of races within the study area.

**Table I- Races Present in the Study Area and City of Lynnwood**

Population	Study Area		City of Lynnwood	
	Number of Persons	Percent of Population	Number of Persons	Percent of Population
White	14,076	56.8%	23,568	66.6%
Black/African American	1,508	6.1%	1,752	5.0%
Asian	5,870	23.7%	6,182	17.5%
Am. Indian/Native Alaskan	485	2.0%	376	1.1%
Pacific Islander	304	1.2%	237	0.7%
Other	1,028	4.1%	1,358	3.8%
Two or More Races	1,519	6.1%	1,916	5.4%
Total Population	24,790	100.0%	35,389	100.0%

Source: U.S. Census American Community Survey (2007-2011)

While the majority of the population reported as white, the study area is home to minority populations. About 23.7 percent of the population reported themselves as Asian, 6.1 percent



## Environmental Justice Technical Memorandum

as African American, 4.1 percent as other race and 6.1 percent as two or more races. There is a higher percentage of minorities in the study area than in the City of Lynnwood as a whole.

### Minority Populations (School Data)

As a secondary source of language information, data on local public elementary schools serving the study area were also analyzed. Students in the study area attend Cedar Valley Community, Cedar Way Elementary, College Place Elementary, Hazelwood Elementary, Lynnwood Elementary, and Spruce Elementary schools, which are located in the Edmonds School District. Table 2 shows demographic information for the elementary schools as collected by the State’s Office of Superintendent of Public Instruction (OSPI).

**Table 2- Demographic Populations in Public Elementary Schools Serving the Study Area**

School	Total Students	White	Black / African American	Asian	American Indian / Native Alaskan	Pacific Islander	Two or More Races	Hispanic
Cedar Valley Community	467	108	28	69	1	2	17	242
Cedar Way Elementary	386	209	17	55	1	5	51	48
College Place Elementary	457	130	43	39	4	0	33	208
Hazelwood Elementary	426	227	22	56	2	1	44	74
Lynnwood Elementary	532	218	43	108	3	8	57	95
Spruce Elementary	486	194	52	83	0	9	37	111
Total	2,754	1,086	205	410	11	25	239	778
Percentage of Students	100.0%	39.4%	7.4%	14.9%	0.4%	0.9%	8.7%	28.2%

Source: Office of Superintendent of Public Institution (2012-2013)

### Hispanic Populations

In the 2007-2011 ACS census data, 2,654 residents (or 10.7% of the population) considered themselves Hispanic. The State’s OSPI also collects information on students of Hispanic origin. The data shows that 778 students (or 28.2 %) of the schools’ students are Hispanic or Latino. The U.S. Census and the OSPI data both indicate the presence of Hispanic/Latino populations. The discrepancy between the U.S. Census data (10.7%) and the State’s OSPI data (28.2%) is most likely due to the U.S. Census data counting populations of Hispanic descent separately because Hispanic origin can apply to any race; whereas the State’s OSPI data counts Hispanic as a standalone race.



## Environmental Justice Technical Memorandum

### **Limited English Proficiency**

Outreach to minority populations often includes the need for communications in non-English languages. The FHWA uses criteria similar to the Department of Justice guidelines. These guidelines require public outreach efforts, including translation, for “each eligible LEP language group that constitutes five percent or 1,000 people (whichever is less) that will likely be affected by a project” (U.S. Department of Justice 2009). Outreach efforts could include, but are not limited to, publishing project materials in other languages, advertising public meetings in other languages, and providing interpreters at one-on-one and/or public meetings.

### ***U.S. Census Data***

Data obtained from the 2007-2011 ACS was used as a primary source for data on LEP populations. Twenty-six languages were reported to be spoken by populations within the project area that speak a language other than English. Table 3 below shows the languages spoken, as well as the number and percent of the population that reports speaking English “less than very well.”

As indicated in Table 3, the Census data shows that approximately three percent of the population is Spanish-speaking and speaks English less than very well. Approximately 2.1 percent of Chinese-speaking population, 3.2 percent of Korean-speaking population, 2.4 percent of Vietnamese-speaking population, and 1.1 percent of Tagalog-speaking population speaks English less than very well. These percentages are lower than the five percent and thus do not trigger the threshold for LEP individuals established by the U.S. Department of Justice.

**Table 3 - Languages Spoken in the Study Area**

Language Spoken at Home	Study Area		City of Lynnwood	
	Speaks English Less than very well	Percent of Total Population	Speaks English Less than very well	Percent of Total Population
Population 5 years and older	23,509	100.0%	33,949	100.0%
Spanish or Spanish Creole	700	3.0%	3,406	10.0%
French (incl. Patois, Cajun)	9	0.0%	115	0.3%
Greek	32	0.1%	0	0.0%
Russian	95	0.4%	217	0.6%
Polish	19	0.1%	29	0.1%
Serbo-Croatian	27	0.1%	70	0.2%
Other Slavic languages	185	0.8%	517	1.5%
Persian	90	0.4%	183	0.5%
Hindi	18	0.1%	92	0.3%
Urdu	195	0.8%	520	1.5%
Other Indic languages	86	0.4%	205	0.6%
Other Indo-European languages	35	0.1%	34	0.1%
Chinese	486	2.1%	1,265	3.7%
Japanese	52	0.2%	234	0.7%
Korean	756	3.2%	904	2.7%
Mon-Khmer, Cambodian	196	0.8%	98	0.3%
Laotian	68	0.3%	198	0.6%
Vietnamese	559	2.4%	891	2.6%
Other Asian languages	67	0.3%	43	0.1%
Tagalog	257	1.1%	619	1.8%
Other Pacific Island languages	86	0.4%	285	0.8%
Arabic	136	0.6%	175	0.5%
African languages	200	0.9%	643	1.9%

Source: U.S. Census American Community Survey (2007-2011)

**School Data**

School districts in Washington State are required to maintain a regular monthly inventory of languages spoken by students within each school. Table 4 below shows the languages spoken by students within Edmonds School District for the six public elementary schools serving the study area. Of all the languages spoken by students within the schools, the number of students speaking Spanish at home triggers the five percent limited proficiency threshold. Table 4 indicates that a significant number of students (nearly 20 percent) speak Spanish at home.

**Table 4 – Languages Spoken at Home by Students within Study Area School**

Language	Cedar Valley	Cedar Way	College Place	Hazelwood	Lynnwood	Spruce	Total	Percent
Akan					1	1	2	0.1%
Amharic	12	2	5	10	7	5	41	1.4%
Arabic	6	6	9	6	8	13	48	1.6%
Armenian					2		2	0.1%
Bangala					1		1	0.0%
Bosnian	2		6		2	1	11	0.4%
Bulgarian	1	1		2	1		5	0.2%
Burmese					1		1	0.0%
Cambodian		3			2	2	7	0.2%
Carolinina					1	2	3	0.1%
Cebuano				1			1	0.0%
Chinese-Cantonese	1	2	2	5	5	2	17	0.6%
Chinese-Mandarin		2	4	3			9	0.3%
Chinese-Unspecified					5		5	0.2%
Chuuk	1						1	0.0%
Czech						1	1	0.0%
Egyptian-Arabic					1		1	0.0%
English	172	323	219	352	358	343	1,767	60.0%
Farsi	1	1	1	1	4		8	0.3%
Fijian	1	2					3	0.1%
French			1				1	0.0%
Fula			1				1	0.0%
Gujarati					3		3	0.1%
Hindi	3	4		2	2		11	0.4%
Hmong			1	2			3	0.1%
Igbo				1			1	0.0%
Indonesian					3	1	4	0.1%
Japanese		1			2	2	5	0.2%
Khmer				3		1	4	0.1%
Korean		4	1	9	4	17	35	1.2%
Malayalam		1				2	3	0.1%
Mandingo	1		7	3	2	8	21	0.7%
Mandinka				3	2	1	6	0.2%
Marshallese					8	1	9	0.3%
Mongolian				2	1		3	0.1%
Nepali	1				1		2	0.1%
Pashto	1				3		4	0.1%
Pilipino/Filipin					4		4	0.1%

Language	Cedar Valley	Cedar Way	College Place	Hazelwood	Lynnwood	Spruce	Total	Percent
Portuguese		1			1		2	0.1%
Punjabi	2	2	1	6	8	2	21	0.7%
Romanian		1		1	2		4	0.1%
Russian	5	2	3	14	8	3	35	1.2%
Serbo-Croatian					1		1	0.0%
Somali	2	6	3				11	0.4%
Soninke	1						1	0.0%
Spanish	198	22	154	40	69	83	566	19.2%
Swahili			10				10	0.3%
Tagalog	1	2	6	9	4	2	24	0.8%
Thai		1			1		2	0.1%
Tigrinya	1	3	7	1	8	5	25	0.8%
Turkish					1		1	0.0%
Twi			1			1	2	0.1%
Ukrainian	5	6	13	4	9	6	43	1.5%
Unknown			1		1		2	0.1%
Urdu	2	2	13	5	5	3	30	1.0%
Uzbek		1			1		2	0.1%
Vietnamese	14	16	3	16	29	26	104	3.5%
Wolof	1		3		1	1	6	0.2%
Zapoteco			1				1	0.0%
<b>Grand Total</b>	<b>435</b>	<b>417</b>	<b>476</b>	<b>501</b>	<b>583</b>	<b>535</b>	<b>2,947</b>	<b>100.0%</b>

Source: Edmonds School District (2013)

## Low-Income Populations

### U.S. Census Data

Income data is derived from 2007-2011 ACS data. The U.S. Census collects data on poverty and categorizes populations as above or below the federally established poverty level. Table 5 shows the data related to income levels. The table also compares low-income populations in the study area to the low-income population in the City of Lynnwood as a whole.

**Table 5 – Populations below Poverty Level**

	Study Area		City of Lynnwood	
	Population Below Poverty	Percent of Population	Population Below Poverty	Percent of Population
Population Below Poverty	3,274	13.3%	5,378	15.2%

Source: U.S. Census American Community Survey (2007-2011)



## Environmental Justice Technical Memorandum

Census data shows that low-income populations are present in the study area. This population constitutes approximately 13.3 percent of the study area. By contrast, 15.2 percent of the city’s population is characterized as low income.

### School Data

Students who come from families with incomes at or below 130 percent of the federal poverty guidelines are eligible to receive free lunches. Free and reduced-price lunch data in Table 6 indicates approximately 38 percent of the student population is eligible for free or reduced-price lunches. The percent eligible for free lunch (29.9 percent) is higher than the U.S. Census poverty data. This data supports the Census data indicating a significant low-income population within the study area.

**Table 6 – Reduced and Free-Lunch Eligibility among Study Area Elementary Students**

Race	Students Eligible for Free Lunch	Percent	Students Eligible for Reduced-Price Lunch	Percent
Cedar Valley Community	202	48.0%	45	10.7%
Cedar Way Elementary	72	18.4%	25	6.4%
College Place Elementary	205	40.6%	38	7.5%
Hazelwood Elementary	79	19.0%	39	9.4%
Lynnwood Elementary	112	22.0%	37	7.3%
Spruce Elementary	132	30.0%	30	6.8%
<b>Total</b>	<b>802</b>	<b>29.9%</b>	<b>214</b>	<b>8.0%</b>

Source: National Center for Education Statistics (2010-2011)

### Potential Temporary Effects

#### Temporary Construction Effects

Construction-related activities may produce the following temporary effects during construction of the improvements:

- Temporary lane closures may be expected at the 33<sup>rd</sup> Ave W / Alderwood Mall Boulevard, the Poplar Way / 196<sup>th</sup> Street SW, and the Poplar Way/Alderwood Mall Parkway intersections during construction.
- As a result of the above closures, congestion on other area roadways and at secondary intersections may decrease level of service at area intersections and increase travel times for motorists.
- Travel time to properties within the study area may increase as temporary lane closures require drivers to take alternate routes to their destinations.
- Temporary fugitive PM<sub>10</sub> emissions (particles that are usually heavy enough to settle into individual sediments within hours to days) from construction activities could be noticeable in the immediate project area. For example, mud and particulates on roadways may be noticeable from construction truck operations.



## Environmental Justice Technical Memorandum

- Temporary increases in noise associated with construction equipment will be noticeable within the immediate study area.

All these effects are temporary and will be limited to the duration of construction activities. Once construction is completed, these effects will cease.

### **Temporary Access Effects**

Access to properties adjacent to the intersections of 33<sup>rd</sup> Ave W / Alderwood Mall Boulevard will be temporarily affected during construction. Properties with driveways close to this intersection include two commercial properties on both the east and west side of 33<sup>rd</sup> Avenue W. Access to businesses will be maintained during construction; however, driveways may be closed at times during construction with access provided via other existing or proposed driveways.

### **Temporary Effects on Access to Transit Service**

Transit service in the immediate area is provided by Community Transit and Sound Transit. Table 7 below shows the transit routes that travel in the immediate vicinity of the project and the affected streets. Connections to other areas, including Seattle and Everett, as well as other communities, can be made at the Lynnwood Transit Center and the Mountlake Terrace Transit Center, which are located to the south of the study area.

**Table 7 – Transit Routes in the Immediate Project Area**

Service Provider	Route	Streets	Transit Stops in Project Area
Community Transit	115	33 <sup>rd</sup> Ave W, Alderwood Mall Blvd	33 <sup>rd</sup> Ave W (nb and sb) and Alderwood Mall Blvd (nb and sb)
Community Transit	116	33 <sup>rd</sup> Ave W, Alderwood Mall Blvd	33 <sup>rd</sup> Ave W (nb and sb) and Alderwood Mall Blvd (nb and sb)
Community Transit	196	196 <sup>th</sup> Street SW	--
Community Transit	201	Alderwood Mall Blvd	Alderwood Mall Blvd (nb and sb)
Community Transit	201	Alderwood Mall Blvd	Alderwood Mall Blvd (nb and sb)
Community Transit	202	Alderwood Mall Blvd	Alderwood Mall Blvd (nb and sb)
Community Transit	410	I-5	--
Community Transit	412	I-5	--
Sound Transit	510	I-5	--
Sound Transit	511	I-5	--
Sound Transit	512	I-5	--
Sound Transit	513	I-5	--
Sound Transit	532	I-5	--
Sound Transit	535	Alderwood Mall Blvd	--

Sources: Community Transit, Sound Transit



## Environmental Justice Technical Memorandum

Transit service in the area will be disrupted during improvement of the 33<sup>rd</sup> Avenue W/Alderwood Mall Boulevard and Poplar Way/196<sup>th</sup> Street SW intersections. Each of these intersections will have a new leg added and will undergo grade changes to accommodate the bridge elevation needed to cross over I-5. During construction, transit routes will not need to be detoured, but transit stops located within the immediate project area will be relocated outside of the construction area.

### ***Temporary Effects on EJ Populations***

Temporary impacts, including construction noise, temporary degradation of air quality, and traffic congestion will be encountered by all populations that live, work, or travel through the project area. EJ populations that may be affected in particular may include minority or low-income residents or employees who travel through the project area to go to work or shop in the area. Low-income populations who use one of the transit routes with stops in the area may be required to access busses at a different location.

### **Potential Permanent Effects**

The Poplar Way Extension Bridge Project will have many positive effects for residents in the Study Area. The bridge will connect the east and west sides of Lynnwood, which are currently bisected by I-5. Residents on the east side of I-5 will now have a more direct route to services, such as medical facilities and shopping, located on the west side. Pedestrian and bicycle mobility will be greatly improved by the new sidewalks and bike lanes on both sides of the new roadway. Finally, emergency services will be improved as aid vehicles will have an alternate route to use when responding to emergencies on the other side of I-5. These project benefits will affect both EJ and non-EJ populations.

### **Avoidance, Minimization, Mitigation, and Enhancement**

#### ***Avoidance***

The Poplar Way Extension Bridge is a key transportation improvement identified in the “Interstate 5 (I-5) to Lynnwood City Center Access Study.” The City of Lynnwood (City) was the lead agency in partnership with the Washington State Department of Transportation (WSDOT) in the preparation of the “Interstate 5 (I-5) to Lynnwood City Center Access Study.” Other study participants included FHWA and Snohomish County. The access study was a planning effort to select solutions to current and forecasted traffic demand and safety issues related to access to the regional transportation system in the Lynnwood area. The purpose of the study was to evaluate the current and forecasted land use and traffic demands of the Lynnwood City Center Sub-Area Plan and prepare alternatives for transportation improvements necessary to satisfy these demands. The study evaluated improvement alternatives for local city streets, the feasibility of modifying existing access points, and / or creating new access points to I-5. A key conclusion of the analysis of the study was that a new bridge extending Poplar Way across I-5 was an important improvement for mobility in the area. Other options for improving east-west connections across I-5 are limited. If the project is not constructed, mobility in the City Center area will be negatively impacted.

#### ***Minimization***



## Environmental Justice Technical Memorandum

Minimization of temporary construction effects, access effects, and transit effects can be accomplished through a variety of actions:

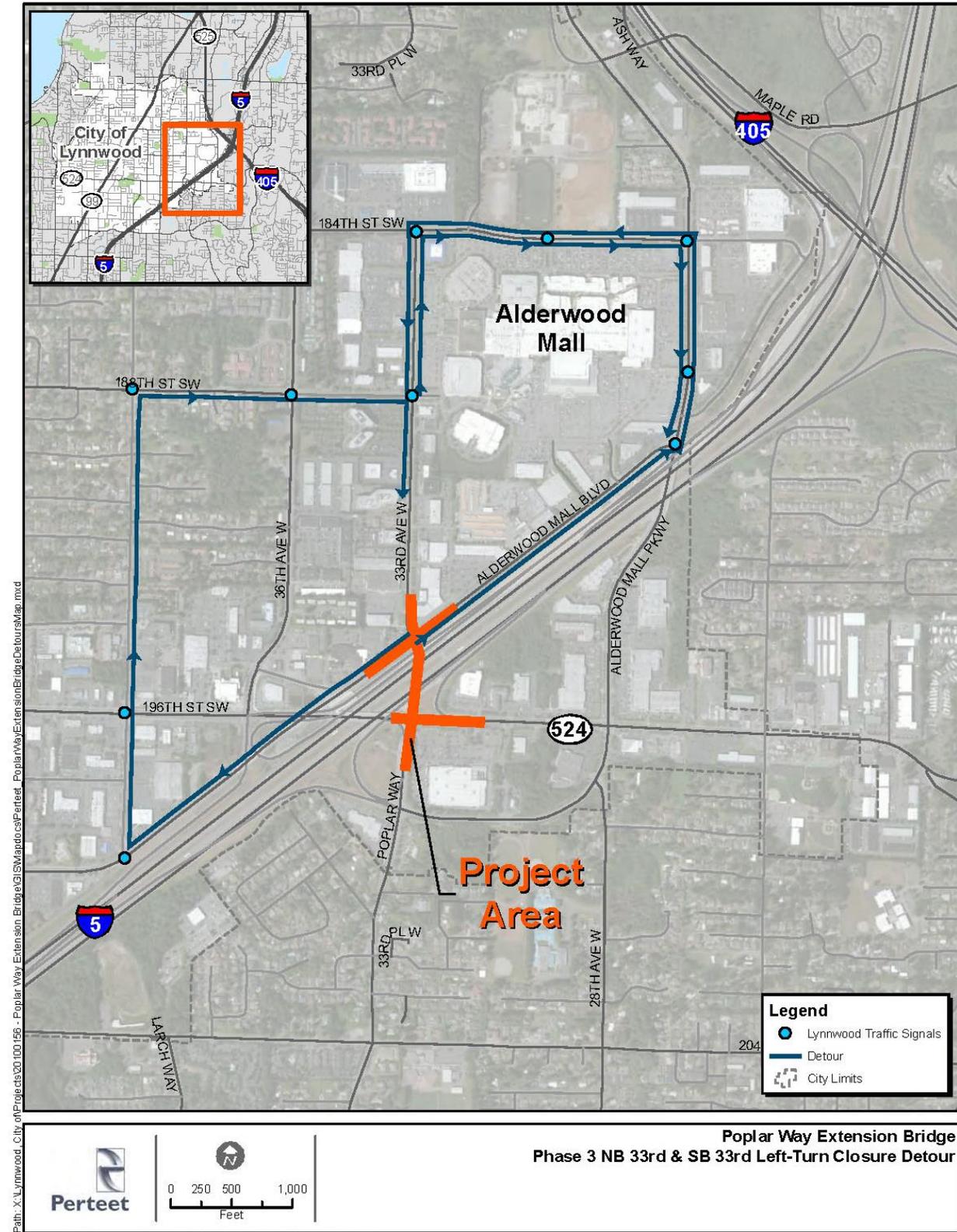
### *Construction Effects*

- Construction will be phased to limit road closures while construction is taking place. The City has developed a Transportation Management Plan to facilitate existing traffic patterns during road/lane closures. The Plan allows at least one lane to be open in each direction on both Alderwood Mall Boulevard and 196<sup>th</sup> Street SW throughout construction.
- When turn restrictions or closure of directional travel is required, implementation of a detour plan will be the main strategy to ensure access to properties and businesses, and to reduce traffic congestion associated with the project to the degree possible. The City of Lynnwood has prepared the detour routes shown in Figures 3 and 4 – Detour Routes.
- When possible, limit construction hours to hours allowed by the City’s noise ordinance (typically 7 am to 7 pm on weekdays). (This may not be possible when work is taking place within the I-5 corridor.)
- Implement Best Management Practices to reduce dust particles and other air pollutants
- Encourage a “no idling” policy for construction vehicles to reduce both noise and air quality impacts.
- Implement a signage program prior to the start of construction to make motorists aware of the project. Pre-construction signs will be posted at the affected intersections.
- Prior to the start of the project, establish a city web-page for the project that has construction information, including road/lane closures, timelines and detours.

### *Access Effects*

- Driveways on 33<sup>rd</sup> Avenue W that serve business in the northwest and northeast quadrants of the 33<sup>rd</sup> Avenue W/Alderwood Mall Boulevard intersection may be closed at times during construction with access provided via other existing or proposed driveways. Due to the change in elevation required by the bridge, some grading will be necessary on these properties. The properties will be restored after construction is complete. Access to the properties will be maintained at all times so that the businesses will not be negatively impacted.
- The City will coordinate with the affected property owners before and during construction, so that the owners and business operators are aware of the construction schedule and changes in driveways.
- A public notice to other affected property owners, residents, and business operators in the study area will be mailed in advance of construction.

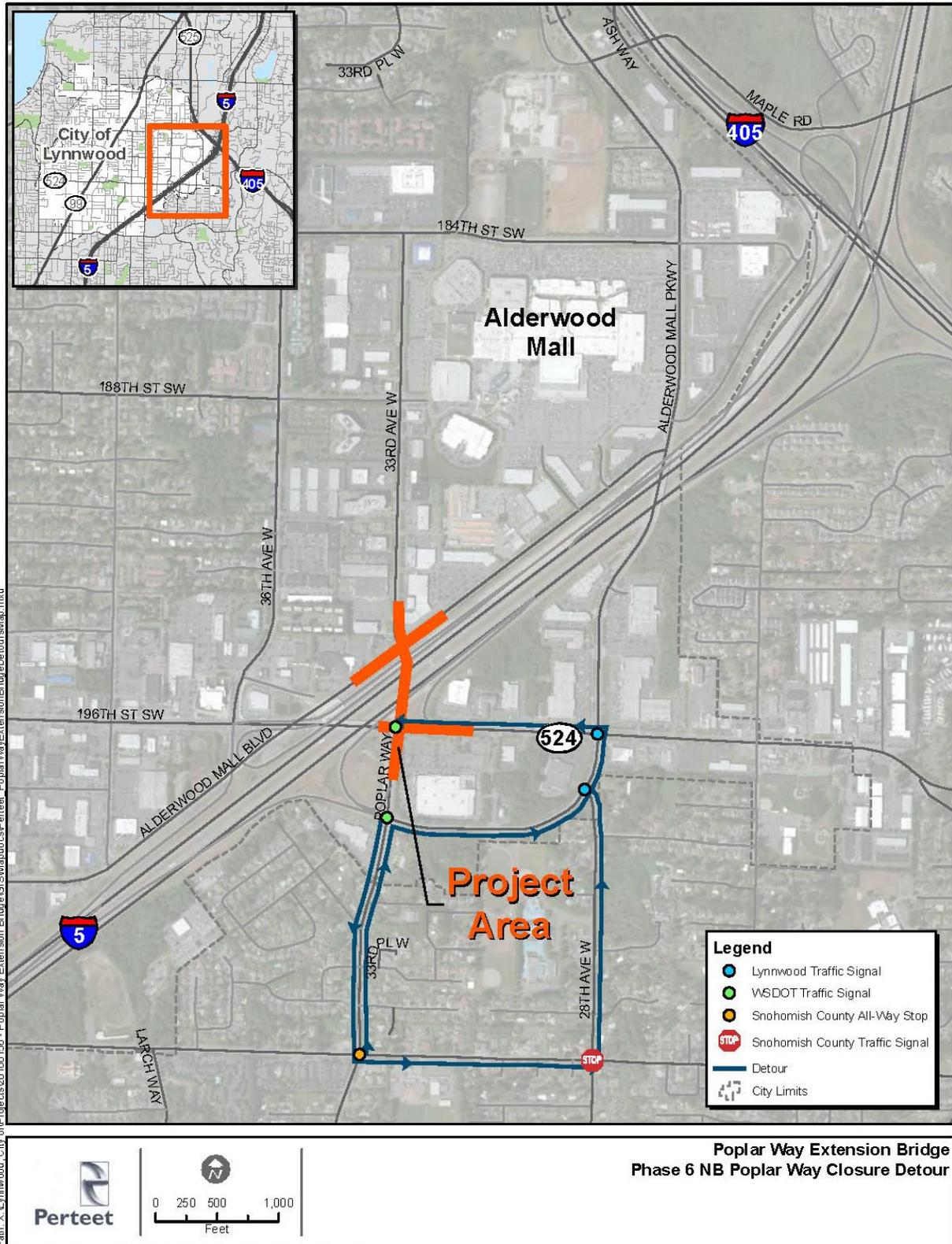
Figure 3 – Detour Route – 33<sup>rd</sup> Avenue W/Alderwood Mall Boulevard



Path: X:\Lynnwood\_City\onProject\320100156 - Poplar Way Extension Bridge\GIS\MapDocs\Perteeet\_PoplarWayExtensionBridgeDetoursMap.mxd

Source: City of Lynnwood, Snohomish County, Puget Sound Regional Council

Figure 4 – Detour Route – Poplar Way





## Environmental Justice Technical Memorandum

### *Access to Transit Effects*

As noted above, several bus routes and four bus stops will be temporarily affected by construction activities at the 33<sup>rd</sup> Avenue W/Alderwood Mall Boulevard and Poplar Way/196<sup>th</sup> Street SW intersections. Bus routes will potentially need to be detoured if full closures have to be implemented, particularly at the 33<sup>rd</sup> Avenue W/Alderwood Mall Boulevard intersection. Coordination with Community Transit and Sound Transit will need to begin early to confirm the detour routes and the locations of bus stops. Transit operators will also need to be aware of schedule delays associated both with the detour routes and with increased congestion at area intersections.

Some transit users, particularly those who use the four bus stops at 33<sup>rd</sup> Avenue W and Alderwood Mall Boulevard may need to travel farther to the relocated stops or to their final destinations. Alternatively, some may not need to travel as far to the relocated stops. The City will work with the transit agencies on appropriate early outreach to transit users. Prior to and during construction, announcements on buses, notices at bus stops, and/or distribution of flyers may be methods used for outreach.

### *Minimization of Effects on EJ Populations*

This analysis has revealed the presence of low-income, minority, and Spanish-speaking populations in the study area. Outreach to ensure that these populations are aware of the project's effects, schedule, and detours will be needed. The City is developing an outreach plan to define communications for the project. Outreach to these affected populations includes:

- Publication of outreach materials in Spanish as well as English.
- Translation of web-page information into Spanish (other languages, including Chinese, Vietnamese and Russian are also available).
- Notice of availability of interpretation services for any public meetings; the notice will have a phone number to call to for interpretation requests.
- One or more public open houses.
- Provision of open house materials in English and Spanish, and other languages if requested.
- One-on-one outreach to business owners affected by the relocation of driveways. Translation services required for any business owners/operators will be provided as needed. Follow up materials to these business owners/operators will be translated into Spanish or other languages as appropriate.
- Notices to transit users will be written in Spanish and English. Notice of the availability of translation services into other languages will be included.

Efforts made to address communications and opportunities available to minority and low income populations will be documented, as will the use of translation services requested for all public meetings.



## Environmental Justice Technical Memorandum

### **Mitigation and Enhancement**

#### *Access Effects*

Driveways on 33<sup>rd</sup> Avenue W that serve business in the northwest and northeast quadrants of the 33<sup>rd</sup> Avenue W/Alderwood Mall Boulevard intersection may be closed at times during construction with access provided at all times via other existing or proposed driveways. Due to the change in elevation required by the bridge, some grading will be necessary on these properties. The properties will be restored after construction is complete.

#### *Access Effects on EJ Populations*

Temporary changes in access to businesses and post-construction property restoration are expected to affect all employees and customers of the businesses, regardless race, language, or income. No disproportionate effects will be borne by EJ populations in this regard.

Other temporary effects from the project can be reduced using the minimization strategies noted above. Additional mitigation is not necessary for other impacts. Enhancement is provided by the new roadway, improved circulation, and non-motorized facilities associated with the completed project. Additional enhancement measures are not required.

### **Conclusion**

U.S. Census and school data indicate that the study area includes low-income, minority, and Spanish-speaking populations. The nature of the project, however, benefits all populations, with predominantly temporary impacts to be borne by all populations.

The City of Lynnwood will use minimization and outreach strategies to reduce impacts associated with the project. With the use of these techniques,

- 1) EJ populations will not experience adverse effects that would be greater in magnitude than those of non-EJ populations in the same area.
- 2) Project effects, largely minor in nature, will be borne equally by all populations in the area.

This environmental justice memorandum follows guidance and methods developed by the FHWA and the Washington State Department of Transportation (WSDOT). The project will benefit overall traffic safety for all populations, including minority and low-income populations. With the use of outreach and minimization strategies, the project complies with FHWA Order 6640.23A.

**No disproportionate Title VI impacts will occur.**

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## Environmental Justice Technical Memorandum

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